BEFORE THE POSTAL RATE COMMISSION

RECEIVED

Dec 10 2 50 PM '01

POSTAL HATE DUMPATE TOR OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

INTERROGATORIES OF UNITED PARCEL SERVICE TO THE UNITED STATES POSTAL SERVICE (UPS/USPS-25 through 28) (December 10, 2001)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatories directed to the United States Postal Service: UPS/USPS-25 through 28.

Respectfully submitted,

John E. McKeever Phillip E. Wilson, Jr. Laura A. Biancke

Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP 3400 Two Logan Square 18th & Arch Streets Philadelphia, PA 19103-2762 (215) 656-3300 (215) 656-3301 (FAX) and 1200 19th Street, N.W. Washington, DC 20036 (202) 861-3900

INTERROGATORIES OF UNITED PARCEL SERVICE TO THE UNITED STATES POSTAL SERVICE

UPS/USPS-25. Refer to the Postal Service's response to interrogatory

AMZ/USPS-T2-9 (redirected from witness Xie). For each zone, provide the average

Great Circle Distance of the Parcel Post mail transported to that zone.

UPS/USPS-26. Refer to the Postal Service's response to interrogatory AMZ/USPS-T2-9 (redirected from witness Xie).

- (a) For each zone, provide the average Great Circle Distance of the PriorityMail transported to that zone.
- (b) For unzoned Priority Mail, provide the average Great Circle Distance of the Priority Mail transported.

UPS/USPS-27. Refer to the Postal Service's response to interrogatory UPS/USPS-17 regarding the Parcel Delivery and Express Mail Segment of the American Society for Quality's "American Customer Satisfaction Index."

- (a) Confirm that Express Mail, Priority Mail, and Parcel Post are included in the Parcel Delivery and Express Mail Segment.
- (b) Identify all other Postal Service products and services that are included in the Parcel Delivery and Express Mail Segment.

UPS/USPS-28. Refer to the Postal Service's response to interrogatory
UPS/USPS-T30-2 (redirected from witness Scherer) which discusses changes in
Priority Mail service standards.

(a) Provide the volume of Priority Mail moving between the 1,084 upgraded zip code pairs in FY2000 and FY2001.

INTERROGATORIES OF UNITED PARCEL SERVICE TO THE UNITED STATES POSTAL SERVICE

(b) Provide the volume of Priority Mail moving between the 104 downgraded zip code pairs in FY2000 and FY2001.

CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

Phillip E. Wilson, Jr.

Dated: December 10, 2001

Philadelphia, PA

2028786